

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Toll Free Service Access Codes |) | CC Docket No. 95-155 |
| |) | |
| Forum to Discuss Toll Free |) | NSD File No. L-02-00 |
| Number Administration |) | |

COMMENTS OF WORLDCOM, INC.

On January 18, 2002, the Commission released a public notice (DA 02-167) seeking comment on a proposal of the Common Carrier Bureau to hold a public forum regarding a number of issues related to toll free number administration. WorldCom, Inc. (WorldCom) supports the proposed forum and agenda with only a very minor reservation.

The proposed agenda comprises four subject areas: (1) issues related to alleged RespOrg abuses of the current system of toll free number administration; (2) the *DSMI Letter*¹ which directed that certain changes be made in the SMS/800 database; (3) the need for restructuring of the existing toll free number administration system; and (4) whether a fee-based system of toll free number administration should be established. WorldCom believes that it is premature to address the fourth agenda item until a definite plan to restructure is in place. Other than that, WorldCom supports the proposed agenda and looks forward to participating in an open, public discussion of the issues.

¹ Letter from L. Charles Keller, Chief, Network Services Division, to Mr. Michael Wade, President, Database Service Management, Inc., DA 00-2754 (rel. Dec. 7, 2000).

The Commission's rules explicitly prohibit warehousing, hoarding, and brokering of toll free numbers. WorldCom looks forward to a discussion of whether the existing system is inadequate to inhibit these practices and allow enforcement of the rules, and what if any changes to that system or industry practices may be needed to ensure compliance with existing rules.

In certain respects, the *DSMI Letter* represented an attempt by the Common Carrier Bureau to fix perceived infirmities with the existing system. WorldCom believes that the changes directed in the *DSMI Letter* would not in fact prevent warehousing, hoarding, or brokering, and would result in needless cost increases for toll free customers. WorldCom looks forward to exploring these issues further in the proposed forum.

WorldCom has long urged the Commission to restructure the current system of toll free number administration. That system is under the complete control of a single industry segment, the Bell Operating Companies, which will increasingly compete in the market for toll free services. This is consistent neither with the mandates of the Communications Act, nor with elementary principles of fair competition. WorldCom believes that a trusted, impartial third-party could administer toll free numbers at a lower cost to the industry and consumers. WorldCom looks forward to an open and frank discussion of this issue.

The question of whether there should be a fee-based system of toll free administration is inextricably linked to the restructuring of the current system. Once a decision is made to restructure toll free number administration, a host of different pricing mechanisms should be discussed. But the decision to restructure really should come first.

Therefore, any discussion of the pricing structure for toll free administration should be deferred, possibly to a subsequent forum.

Indeed, it seems likely that this forum may be the first of several on these matters. The Bureau and other participants will undoubtedly raise questions that cannot be immediately answered. WorldCom looks forward to continued participation in an open discussion of toll free number administration.

Respectfully submitted,

WorldCom, Inc.

/s/

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